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5 *Bank of America, N.A.*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 LKIMMY INC. a Nevada corporation,
9 Plaintiff,

10 v.

11 BANK OF AMERICA, N.A., a national banking
association; IL KIM aka JULIUS KIM, an
12 individual; DOES I through X; and ROE
BUSINESS ENTITIES I through X; inclusive,
13 Defendants.
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Case No.: 2:20-cv-02184-RFB-VCF

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION
TO STAY PROCEEDINGS ON
DEFENDANT BANK OF AMERICA,
N.A.'S MOTION TO DISMISS**

(First Request)

15 Defendant BANK OF AMERICA, N.A. ("BANA") and Plaintiff LKimmy, Inc. ("Plaintiff"),
16 by and through their respective counsel of record, hereby stipulate and agree to extend the deadline
17 for BANA to file an opposition to Plaintiff's Motion to Stay Proceedings on Defendant Bank of
18 America, N.A.'s Motion to Dismiss (ECF No. 6) filed on December 14, 2020. The deadline for
19 BANA to respond to the Motion to Stay is currently set for December 28, 2020. The parties hereby
20 stipulate to extend the deadline to January 5, 2021. Pursuant to LR 7-2, LKimmy's deadline to file
21 a reply brief will be January 12, 2021.

22 This stipulation is submitted in compliance with LR IA 6-1. Counsel for BANA requests the
23 proposed extension in order to ensure sufficient time to coordinate the filing of BANA's opposition
24 to the Motion to Stay, in consideration of BANA's and counsel's respective schedules. Accordingly,
25 the parties respectfully submit that the proposed extension is supported by good cause.

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1 The parties agree that the requested extension is not being requested in bad faith or to delay
2 these proceedings unnecessarily.

3 This is the first stipulation for extension of time to file an opposition.

4 DATED this 24th day of December, 2020.

5 **WILSON, ELSE, MOSKOWITZ,
6 EDELMAN & DICKER LLP**

7 */s/ Chad C. Butterfield*

8 CHAD C. BUTTERFIELD

9 Nevada Bar No. 10532

6689 Las Vegas Blvd. South, Suite 200

Las Vegas, Nevada 89119

Attorneys for Defendant

Bank of America, N.A.

11 DATED this 24th day of December, 2020.

12 **HONG & HONG LAW OFFICES**

13 */s/ Joseph Y. Hong*

14 JOSEPH Y. HONG, ESQ.

15 Nevada Bar No. 5092

1980 Festival Plaza Dr., Suite 650

Las Vegas, NV 89135

Attorney for Plaintiff LKimmy, Inc.

18 **ORDER**

19 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

20 Dated this 28th day of December, 2020.

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25 **RICHARD E. BOULWARE, II**
26 **United States District Court**
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